

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

Gary Perez and Matilde Torres,

*Plaintiffs,*

v.

Case No. 23-cv-00977-FB

City of San Antonio,

*Defendant.*

**DECLARATION OF JONATHAN GUYNN IN SUPPORT OF PLAINTIFFS' MOTION  
FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

I, Jonathan Guynn, of full age, hereby declare as follows:

1. I am an attorney at the law firm of Jones Day. I am admitted to practice law before the Courts of the States of California, New York, and Texas and am admitted in the above-captioned matter.
2. Attached hereto as Exhibit A is a true and correct copy of a communication from counsel for the City of San Antonio, Fred Jones, dated June 27, 2023.
3. Attached hereto as Exhibit A-1 is a true and correct copy of a document, referred to as "the slide deck presented at the April 19, 2023 HDRC meeting," and linked in Mr. Jones's June 27, 2023 communication.
4. Attached hereto as Exhibit A-2 is a true and correct copy of a document, referred to as "Brackenridge Park Tree-Ring Dating Report," and linked in Mr. Jones's June 27, 2023 communication.
5. Attached hereto as Exhibit A-3 is a true and correct copy of a document, referred to as "Lambert Beach Improvements – Tree Exhibits," and linked in Mr. Jones's June 27, 2023 communication.

6. Attached hereto as Exhibit A-4 is a true and correct copy of a document, referred to as “Independent Arborist Report,” and linked in Mr. Jones’s June 27, 2023 communication.

7. Attached hereto as Exhibit A-5 is a true and correct copy of a document, referred to as “Tree Matrix,” and linked in Mr. Jones’s June 27, 2023 communication.

8. Attached hereto as Exhibit B is a true and correct copy of a communication from counsel for the City of San Antonio, Fred Jones, dated July 14, 2023.

9. Attached hereto as Exhibit C is a true and correct copy of a communication from counsel for the City of San Antonio, Fred Jones, dated August 3, 2023.

10. Attached hereto as Exhibit C-1 is a true and correct copy of a document, named “Brackenridge\_Work\_Plan\_v3.pdf,” that was attached to Mr. Jones’s June 27, 2023 communication.

11. Attached hereto as Exhibit C-2 is a true and correct copy of a document, named “2023-07-26 Image of area requested for 8-12-23.png,” that was attached to Mr. Jones’s June 27, 2023 communication.

12. Attached hereto as Exhibit D is a true and correct copy of a communication from counsel for the City of San Antonio, Fred Jones, dated August 9, 2023.

13. Attached hereto as Exhibit D-1 is a true and correct copy of a document, named “Brackenridge\_Work\_Plan\_v3.pdf,” that was attached to Mr. Jones’s August 9, 2023 communication.

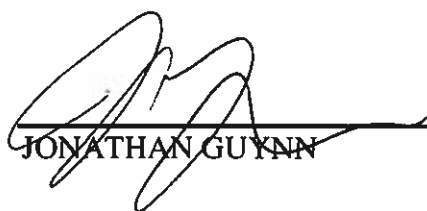
14. Attached hereto as Exhibit E is a true and correct copy of a communication from employees of the City of San Antonio, dated February 1, 2023.

15. Attached hereto as Exhibit F is a true and correct copy of the August 3, 2023 City Council meeting notes and accompanying contract for Phase I of the Bond Project, which the City has made publicly available.

16. Attached hereto as Exhibit G is a true and correct copy of the April 11, 2023 “Brackenridge Park Phase I Bond Improvements, Lambert Beach Area,” obtained via the Texas Public Information Act from the Texas Historical Commission.

I declare under penalty of perjury that the foregoing is true and correct.

Signed on the 10 day of August, 2023  
In Dallas County, Texas, United States

  
JONATHAN GUYNN